

United States Courts
Southern District of Texas
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT
OF TEXAS DIVISION

JUL 10 2019

David J. Bradley, Clerk of Court

_KEITH_ALEXANDER_LAMB_JR____,
PLANTIFF

V.

_DEPUTY_MICHAEL_BERRY____,
_ASST._DISTRICT_ATTORNEY_GORDON_DUDLEY____,
_SHERIFF_RAND_HENDERSON____ AND,
_ATTORNEY_GENERAL_KEN_PAXTON____,
DEFENDANTS

CASE NO. _____

JURY TRIAL

19 CV 2492

COMPLAINT

1. My United States constitutional rights are being violated under 42 U.S.C. 1983 Equal Protection rights, My Liberty Rights are being violated under the Contract Clause and Res Judicata 7th amendment rights have been violated as well.
2. On March 28th, 2019, I was contacted by Michael Berry of the Montgomery County Sheriff's office in his official capacity. I was well within my rights to demand payment as I was the secured party, during a breach of contract by Elzbieta Celinski. Officer Berry called me and wasn't listening to anything I had to say. I stated that the only crime committed was "theft of services" against me and that since we had a signed contract, I didn't even know why he was even calling me. I stated, "this was a civil matter and he didn't have any jurisdiction." I was never aware of the false allegations made against me by the Celinski's or the warrant that was issued. Since Officer Berry said, "I had nothing to worry about, he just wanted to hear my side." I was latter pulled over for a traffic violation in Austin County on 5-15-19 where i was arrested for Agg. Robbery and thrown in jail with a 100K Bond. As soon as I received my complaint from my lawyer a few weeks later, I realized from the statements Officer Berry wrote as to why he wasn't listening to anything I had to say. My "Liberty Rights" were violated and I didn't receive "equal protection" under the law. Officer Berry stated under Oath, "The defendant also has a history of violence according to his criminal history, having been "unsuccessfully prosecuted" for Aggravated assault in separate cases in Harris County in 2011 and 2016." Violating my 7th amendment rights since I was acquitted on one of

those charges in San Antonio in 2011. The other charge was an arrest made at my residents where property was stolen from my mother. Two firearms were stolen by James Smith a friend I should of never put my trust in. His mother a good friend of mine died a few years prior and I gave him a place to stay and a job to assist him in getting his life together. My wife had mentioned that my mothers property was missing two weeks into his stay. When I confronted James Smith he pulled a gun on me and i did whatever I had to do to stay alive. The officers didn't hear anything I had to say at that time either. I feel my charges were enhanced due to the statement Officer Berry made about the unsuccessful prosecutions from the prior charges not convictions. I live three hours away and was informed by my Bond Probation officer that i won't be able to transfer the probation to San Antonio making it difficult to see my family. I don't feel Officer Berry was trained properly by Rand Henderson before the time of this complaint and that none of this would of went so far, if Gordon Dudley who signed his complaint, would have "duly attested" Officer Berry's written complaint. His complaint is full of false statements prejudice and bias allegations.

3. I built a good reputation in Texas and spent a lot of money building up my Name. I finally got to a point where, word of mouth is enough to keep us busy. I was getting offers to sell my company and lost some high dollar bids by not making appointment in my Plumbing company forcing me to downsize and lay people off, I also own a audio and visual engineering company that has lost some really important clients. I've missed classes and postponed jobs for months now. I'm attempting to get my thoughts together but the fear of meeting new customers and not knowing that any little disagreement can turn into a prison sentence of 5-99 years is over bearing. I'm seeking relief in the amount of 6.2 million so that I can close three companies, re-enroll in school, move and pursue a new career.

Plaintiff: Keith Alexander Lamb Jr.

Signature: 

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